

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

_____	)	
BMG RIGHTS MANAGEMENT (US) LLC, <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	No. 1:14cv1611 (LO / JFA)
	)	
COX ENTERPRISES, INC. <i>et al.</i> ,	)	
	)	
<i>Defendants.</i>	)	
_____	)	

**CONSENT MOTION TO EXTEND TIME TO RESPOND**

PURSUANT to Rules 6(b)(1)(A) and 12(a)(1) of the Federal Rules of Civil Procedure, Defendants move for an extension of time in which to file their response to the *First Amended Complaint* (Dkt. No. 16) on the following grounds:

1. By *Complaint* filed November 26, 2014, Plaintiffs commenced this copyright infringement action against Defendants (Dkt. No. 1). Summonses were issued, but returned unexecuted (Dkt. Nos. 3, 17, 18, & 19). The *First Amended Complaint* was filed on December 10, 2014 (Dkt. No. 16), and amended summonses were issued (Dkt. No. 20). The amended summonses were returned executed as of December 12, 2014 (Dkt. No. 21), meaning that Defendants' response(s) would be due January 2, 2015.

2. In light of the legal and factual issues raised, as well as the intervening holidays between the date of service and the current response date, Defendants now seek an additional thirty (30) days in which to respond—that is, through and including February 2, 2015.

3. The parties have met and conferred, and Plaintiffs consent to the relief sought herein.

4. A proposed order is submitted herewith. The parties do not seek oral argument.

WHEREFORE, Defendants respectfully request that this motion be granted and that the proposed order be entered.

Dated: December 31, 2014

/s/ Craig C. Reilly  
Craig C. Reilly, Esq. (VSB # 20942)  
111 Oronoco Street  
Alexandria, Virginia 22314  
TEL (703) 549-5354  
FAX (703) 549-5355 (NEW)  
[craig.reilly@ccreillylaw.com](mailto:craig.reilly@ccreillylaw.com)  
*Counsel for Defendants*

*Of Counsel for Defendants:*

Andrew P. Bridges (*pro hac vice* pending)  
FENWICK & WEST LLP  
555 California Street  
San Francisco, California 94104  
TEL (415) 875-2389  
FAX (415) 281-1350  
[abridges@fenwick.com](mailto:abridges@fenwick.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on December 31, 2014, the foregoing was filed and served electronically by the Court's CM/ECF system upon all registered users:

/s/ Craig C. Reilly  
Craig C. Reilly, Esq. (VSB # 20942)  
111 Oronoco Street  
Alexandria, Virginia 22314  
TEL (703) 549-5354  
FAX (703) 549-2604  
[craig.reilly@ccreillylaw.com](mailto:craig.reilly@ccreillylaw.com)  
*Counsel for Defendants*